

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

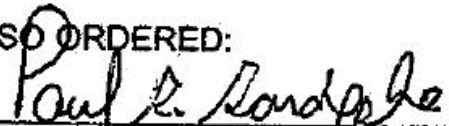
*David E. Patton*  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** January 6, 2021

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)**

Dear Judge Gardephe:

I write to request twelve temporary modifications to Mr. Rose's travel restrictions to allow him to attend weekend trainings and conferences hosted by Ethnicity Hair Collections (EHC), a company with which he has worked for several years. Your Honor has authorized Mr. Rose's out-of-state travel for a number of prior EHC events. See ECF No. 200; ECF No. 213; ECF No. 249; ECF No. 289. All of Mr. Rose's business trips during the pendency of this case have taken place without issue. I now request that he be permitted to travel as follows for additional EHC events:

- January 16-18, 2021: Virginia Beach, VA
- January 27-30, 2021: St. Thomas, USVI
- February 13-15, 2021: Georgetown, SC via Charlotte, NC
- February 20-22, 2021: Durham, NC via Charlotte, NC
- March 13-15, 2021: Puerto Rico
- March 27-29, 2021: Wilmington, NC via Charlotte, NC
- April 10-12, 2021: Florence, SC via Charlotte, NC
- April 24-26, 2021: Greenville, NC via Charlotte, NC
- May 8-10, 2021: Columbia, SC via Charlotte, NC
- May 22-24, 2021: Fayetteville, NC via Charlotte, NC
- June 12-14, 2021: Cary, NC via Charlotte, NC
- June 26-28, 2021: Charlotte, NC

The Government has no objection to this request, and Pretrial Services takes no position on it. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner  
Ariel Werner, Esq.  
Assistant Federal Defender

cc: Mathew Andrews, Assistant U.S. Attorney  
Louis Pellegrino, Assistant U.S. Attorney  
Courtney DeFeo, U.S. Pretrial Officer